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July 4, 2016

Via ECF

Honorable Ronnie Abrams United States District Judge United States Courthouse 40 Foley Square New York, New York 10007

> Re: United States v. Jason Galanis et al 16-cr-0371-4 (RA)

Dear Judge Abrams:

This firm represents defendant Hugh Dunkerley in the above-captioned matter. This letter/motion is respectfully submitted on behalf of Mr. Dunkerley to request an additional two week extension of time for Mr. Dunkerley to satisfy the remaining condition of his bond.

The bond is a \$1,000,000 personal recognizance bond secured by \$200,000 worth of cash and Mr. Dunkerley is on home confinement with monitoring. The bond also requires a financially responsible person ("FRP") to cosign the bond. To date, Mr. Dunkerley has satisfied all of the conditions of his bond with the exception of securing a FRP to cosign the bond. The defense has proffered an individual who it thought would satisfy the FRP requirement, but do to circumstances beyond Mr. Dunkerley's control, that person is no longer available as a cosigner/surety. The current deadline to produce a FRP to sign the bond expires tomorrow, July 5, 2016.

I have conferred with AUSA Aimee Hector about this issue and my request for a further two week extension and she advises me that the Government consents to this request.

In light of the above, I respectfully request defendant be given an additional two weeks, to July 19, 2016, to meet the remaining condition of the bond.

Thank you in advance for Your Honor's consideration in this matter.

Respectfully submitted,

Joseph A. Grob

cc: AUSA Aimee Hector

AUSA Brian Blais (via email)

AUSA Rebecca Mermelstein (via email)

Hugh Dunkerley (via email)